

## **EXHIBIT 1**

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION  
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT  
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-01789 (SMB)

SIPA Liquidation

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the  
Liquidation of Bernard L. Madoff  
Investment Securities LLC

Plaintiff,

v.

DEFENDANTS LISTED ON EXHIBIT A,

Defendants.

**[PROPOSED] ORDER AUTHORIZING THE CONTINUED  
DEPOSITION OF BERNARD L. MADOFF ON DAY TWO TOPICS**

**WHEREAS**, on August 24, 2016, this Court held a hearing and issued a bench ruling approving the requests of the Participating Customers<sup>1</sup> to depose Bernard L. Madoff (“Madoff”);

<sup>1</sup> Capitalized terms used but not defined herein shall have the meaning ascribed to them in the Madoff Deposition Order.

**WHEREAS**, on September 29, 2016, this Court entered the Order Authorizing the Deposition of Bernard L. Madoff (the “Madoff Deposition Order,” ECF No. 14213), permitting testimony on the Day 1 Deposition Topics;

**WHEREAS**, on December 20, 2016, the Participating Customers deposed Madoff on the Day 1 Deposition Topics;

**WHEREAS**, on January 19, 2017, this Court entered the Order Authorizing the Continued Deposition of Bernard L. Madoff (ECF No. 14905), permitting further testimony on the Day 1 Deposition Topics;

**WHEREAS**, the Participating Customers and the Trustee deposed Madoff on the Day 1 Deposition Topics on April 26 and April 27, 2017;

**WHEREAS**, the transcript of deposition held on April 26 and April 27, 2017 was received on May 10, 2017;

**WHEREAS**, pursuant to the Madoff Deposition Order ¶ C, counsel for the Trustee and/or the Participating Customers were permitted to file with the Court a request for a second deposition day, specifically identifying any proposed deposition topics;

**WHEREAS**, the Participating Customers who timely filed requests (the “Day 2 Deposition Requests”) to participate in the continued deposition of Madoff are identified on Exhibit A annexed hereto (the “Day 2 Participants”);

**WHEREAS**, on June 29, 2017, this Court held a hearing on the Day 2 Deposition Requests, adjourning the matter to July 26, 2017;

**WHEREAS**, on July 26, 2017, this Court held a continued hearing on the Day 2 Deposition Requests and considered all of the requests, objections, and arguments of counsel

raised at the hearings held on June 29 and July 26, 2017, and approved, in part, the Day 2 Deposition Requests to the extent set forth during the hearing held on July 26, 2017;

**IT IS HEREBY ORDERED THAT:**

The continued deposition of Madoff is authorized subject to the terms and limitations of this Order. The Day 2 Participants and the Trustee are authorized to inquire solely regarding the following topics (the “Day 2 Deposition Topics”):

1. The statements contained in the Federal Bureau of Investigation form FD-302 memorializing a proffer meeting with Bernard Madoff held on December 16, 2008;
2. The Day 2 Participants’ accounts held with Bernard L. Madoff Investment Securities (“BLMIS”), or Bernard L. Madoff, including the history of Day 2 Participants’ accounts and the extent, if any, to which BLMIS or Madoff was directed to and did buy, sell and hold actual securities on behalf of the Day 2 Participants; and
3. Madoff’s understanding of the reports and other information contained on the reels of microfilm produced by the Trustee to the Participating Customers in 2017 as shown in Exhibit B (microfilm reels produced in 2017), concerning whether Madoff or BLMIS used customer funds to purchase securities shown on the customer statements of the Day 2 Participants or held such securities for his, or BLMIS’, own account.

The following limitations and procedures are imposed on Madoff’s deposition:

- A. For each day of examination on the Day 2 Deposition topics, except for any counsel that may appear on Madoff’s behalf, two attorneys for the Trustee and two attorneys for the Day 2 Participants may appear (collectively, “Authorized Counsel”); no other appearances are authorized.

B. Helen Davis Chaitman of Chaitman LLP is appointed lead representative counsel (“Lead Counsel”) for the Day 2 Participants.

C. Examination on the Day 2 Deposition Topics may take place over the course of four (4) days for a maximum of seven (7) hours per day, on dates as soon as practicable, but subject to the discretion of the warden of the Federal Correctional Institution located in Butner, North Carolina, as follows:

- i. On the first and second day, the Day 2 Participants may inquire as to the Day 2 Deposition Topics, provided that the Trustee may inquire as to the Day 2 Deposition Topics as time permits on the first or second day;
- ii. On the third day, counsel for the Trustee may inquire as to the Day 2 Deposition Topics and any other areas of cross-examination;
- iii. On the fourth day, the Day 2 Participants may conduct re-direct, provided that the Trustee shall have adequate time for any additional cross-examination based on the Day 2 Participants’ re-direct;
- iv. The Trustee’s counsel and counsel for the Day 2 Participants shall arrange with the court reporter for the rough transcript of each deposition day to be circulated to the Trustee’s counsel and all counsel for the Day 2 Participants as soon as possible after each deposition day ends and no later than 8:00 pm eastern time on that deposition day.

D. Authorized Counsel are prohibited, at any point during Madoff’s deposition, from asking Madoff any questions beyond the scope of the Day 2 Deposition Topics, including any questions about (i) the Profit Withdrawal Litigation, and (ii) Jeffrey M. Picower, Capital Growth Company, Decisions Inc., Favorite Funds, JA Primary

Limited Partnership, JA Special Limited Partnership, LAB Partnership, JEMW Partnership, JF Partnership, JFM Investment Companies, JLM Partnership, JMP Limited Partnership, Jeffrey M. Picower Special Company, Jeffrey M. Picower P.C., The Picower Foundation, The Picower Institute for Medical Research, The Trust f/b/o Gabrielle H. Picower, and Barbara Picower, individually, as Executor of the Estate of Jeffrey M. Picower, as Trustee for The Picower Foundation and as Trustee of the Trust f/b/o Gabrielle H. Picower (collectively, the “Picower Parties”) or their agents, or the Picower Parties’ BLMIS accounts (other than as set forth in the transcript of hearing dated August 24, 2016 in this matter). To the extent Madoff testifies regarding the Picower Parties or their BLMIS accounts in responding to questions on any of the Day 2 Deposition Topics, any information specific to the Picower Parties’ BLMIS accounts shall be redacted whenever practicable and Authorized Counsel may follow up with questions concerning the Picower Parties only to the extent that such follow up questions relate directly to the Day 2 Deposition Topics. However, Authorized Counsel may not use any testimony by Madoff regarding Picower or the Picower Parties to deviate from the Day 2 Deposition Topics, including but not limited to inquiring about Picower’s conduct that is not directly related to the Day 2 Deposition Topics.

E. In advance of the deposition, Chaitman LLP will provide a copy of this Order to Madoff.

F. Absent further order of the Court, the deposition testimony of Madoff and the transcript(s) (the “Transcripts”) thereof on the Day 1 and Day 2 Deposition Topics shall not be used by any person or entity for any reason as it relates to the Picower Parties, including but not limited to in any pending or future litigation that may be

brought against the estate of Jeffrey M. Picower, the Picower Parties or their agents, or any related person or entity.

G. The Transcripts for each day of Madoff's deposition shall remain confidential and under seal for twenty-one (21) days after the date that the final Transcript of each day of deposition testimony on the Day 2 Deposition Topics is provided to counsel to the Trustee, representative Lead Counsel for the Day 2 Participants, the Picower Parties and SIPC, or, if any party seeks to seal, strike or redact any portion of the Transcripts within the 21-day period, then solely as to that portion of the Transcript, the day after a final, non-appealable order is entered on such motion(s) (the "Confidentiality Period"). Each of the Transcripts shall automatically be re-designated as not confidential when the Confidentiality Period for each of the Transcripts expires, subject to any sealing, striking or redactions that the Court may have ordered.

H. During the Confidentiality Period, the Transcripts and contents of Madoff's deposition may not be disclosed, except to Authorized Counsel and their retained experts, if any, for the Trustee, the Day 2 Participants, the Picower Parties and SIPC, all of whom, including the experts, shall maintain the confidentiality of the Transcripts and their contents and all of whom may file with the Court, under seal, requests to strike and/or redact any questions or answers in the Transcripts, including any testimony concerning (i) any topics other than the approved Day 2 Deposition Topics, (ii) profit withdrawal issues, as limited by Paragraph D above, (iii) the Picower Parties or their agents or related parties, or any BLMIS accounts held by or on behalf of any of the Picower Parties.

I. Any requests on motions to strike and/or redact any part of Madoff's deposition Transcripts, and any responses thereto, shall be filed under seal pursuant to Section III.C of this Court's Procedures for the Filing, Signing and Verification of Documents by Electronic Means promulgated under Local Rule 5005-2, shall be served on counsel for the Trustee, the Day 2 Participants, the Picower Parties and SIPC at the time of filing under seal, and shall remain confidential during the Confidentiality Period.

J. In the event that counsel for the Trustee, the Day 2 Participants, the Picower Parties or SIPC receives any request, subpoena or other process seeking disclosure of Madoff's deposition Transcripts or information related to Madoff's testimony during the Confidentiality Period, such counsel, within three business days thereof, shall notify the Court and counsel for the Trustee, the Day 2 Participants, the Picower Parties and SIPC of the subpoena or other request, and shall await direction from the Court before responding to such request, subpoena, or other process.

K. The Participating Customers whose fact discovery closed under the case management order prior to July 7, 2016 (identified on Exhibit C attached hereto) and who failed to file a Day 2 Deposition request are not permitted to participate in Madoff's deposition and discovery in those cases shall be deemed closed from the entry of this Order. As to the Day 2 Participants whose discovery is set to close on or after July 7, 2016, the Court extends fact discovery for the limited and sole purpose of taking Madoff's deposition. Other than for that purpose, the deadlines in the applicable case management orders remain unchanged other than as set forth in the transcript of hearing dated June 29, 2017 in this matter. Notwithstanding the dates set forth in the case management orders, counsel for the Trustee, the Day 2 Participants, the Picower Parties



and SIPC have the right to move the Court for further discovery based upon Madoff's testimony other than as set forth in the transcript of hearing dated June 29, 2017 in this matter.

L. The Participating Customers who did not request Day 2 Deposition Topics are not permitted to participate in Madoff's Day 2 Deposition.

M. After Mr. Madoff's deposition on the Day 2 Deposition Topics, no further testimony may be taken from Mr. Madoff on the Day 1 Deposition Topics or Day 2 Deposition Topics without further order of the Court.

N. Once the testimony on Day 2 Deposition Topics is completed, there will be no additional testimony of Mr. Madoff unless the Court determines additional testimony is needed based on a demonstrated showing of need and relying on only those documents made available in discovery after the entry of this Order.

O. This Court shall retain exclusive jurisdiction over the enforcement, implementation, and interpretation of this Order.

Dated: New York, New York  
August \_\_\_\_, 2017

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**Hon. Stuart M. Bernstein**  
**United States Bankruptcy Judge**

## **EXHIBIT A**

Adv. Pro. No.	Case Name	Defense Counsel
10-04292	Robert Roman	Chaitman LLP
10-04302	Joan Roman	Chaitman LLP
10-04321	Herbert Barbanel, et al.	Chaitman LLP
10-04327	Gertrude E. Alpern Revocable Trust, et al.	Chaitman LLP
10-04362	Sage Associates, et al.	McDermott Will & Emery LLP
10-04367	Benjamin T. Heller	Chaitman LLP
10-04397	Fern C. Palmer, individually and in her capacity as trustee for the Fern C. Palmer Revocable Trust dtd 12/31/91, as amended, et al.	Chaitman LLP
10-04400	Sage Realty, et al.	McDermott Will & Emery LLP
10-04415	Barbara J. Berdon	Dentons US LLP
10-04438	Estate of Seymour Epstein, et al.	Chaitman LLP
10-04446	Trust Under Agreement Dated 12/6/99 for the benefit of Walter and Eugenie Kissinger, et al.	Chaitman LLP
10-04469	Carol L. Kamenstein, et al.	Chaitman LLP
10-04486	The Norma Shapiro Revocable Declaration of Trust Under Agreement Dated 9/16/08, et al.	Dentons US LLP
10-04487	Estate of Audrey Weintraub, et al.	Chaitman LLP
10-04503	Judd Robbins	Chaitman LLP
10-04541	Kenneth W Perlman, et al.	Chaitman LLP
10-04545	Jerome Goodman, et al.	Chaitman LLP
10-04570	Jacob M. Dick Rev Living Trust DTD 4/6/01, et al.	Chaitman LLP
10-04614	Robert S. Whitman	Chaitman LLP
10-04655	Jaffe Family Investment Partnership, et al.	Chaitman LLP
10-04702	S&L Partnership, a New York partnership, et al.	Dentons US LLP
10-04718	The Jordan H. Kart Revocable Trust, et al.	Chaitman LLP
10-04728	Bruno L. Digiulian	Chaitman LLP
10-04748	Mark Horowitz	Chaitman LLP
10-04749	Philip F. Palmedo	Chaitman LLP
10-04752	Kuntzman Family LLC, et al.	Chaitman LLP
10-04762	Estate of James M. Goodman, et al.	Chaitman LLP
10-04798	Janet Jaffe Trust UA dtd 4/20/90, et al.	Chaitman LLP
10-04803	The Estelle Harwood Family Limited Partnership, et al.	Chaitman LLP
10-04806	Kenneth M. Kohl, et al.	Chaitman LLP
10-04809	Edyne Gordon, et al.	Chaitman LLP
10-04818	Toby Harwood	Chaitman LLP
10-04823	Frank DiFazio, et al.	Chaitman LLP
10-04826	Estate of Boyer Palmer, et al.	Chaitman LLP
10-04861	Harold J. Hein	Dentons US LLP
10-04878	Lisa Beth Nissenbaum Trust, et al.	Chaitman LLP
10-04882	Laura E. Guggenheim er Cole	Dentons US LLP
10-04912	Harry Smith Revocable Living Trust, et al.	Chaitman LLP
10-04920	Glenhaven Limited, et al.	Chaitman LLP
10-04931	Estate of Muriel B. Cantor, et al.	Chaitman LLP
10-04956	Denis M. Castelli	Chaitman LLP
10-04961	Sylvan Associates LLC f/k/a Sylvan Associates Limited Partnership, et al.	Chaitman LLP
10-04979	James M. New Trust dtd 3/19/01, et al.	Chaitman LLP
10-04991	Guiducci Family Limited Partnership, et al.	Chaitman LLP
10-04995	Trust u/art Fourth o/w/o Israel Wilenitz, et al.	Chaitman LLP
10-05026	Walter Freshman Trust A, a Florida trust, et al.	Chaitman LLP
10-05037	Barbara L. Savin	Chaitman LLP
10-05079	Estate of James M. Goodman, et al.	Chaitman LLP
10-05104	The Gloria Albert Sandler and Maurice Sandler Revocable Living Trust, et al.	Chaitman LLP
10-05124	The Lawrence J. Ryan and Therese R. Ryan Revocable Living Trust, et al.	Chaitman LLP
10-05128	JABA Associates LP, et al.	Chaitman LLP
10-05130	Barbara Kotlikoff Harman	Chaitman LLP

<b>Adv. Pro. No.</b>	<b>Case Name</b>	<b>Defense Counsel</b>
10-05133	Fern C. Palmer, et al.	Chaitman LLP
10-05151	Palmer Family Trust, et al.	Chaitman LLP
10-05157	The Harnick Brothers Partnership, et al.	Chaitman LLP
10-05184	Laura Ann Smith Revocable Living Trust, et al.	Chaitman LLP
10-05196	Irene Whitman 1990 Trust U/A DTD 4/13/90, et al.	Chaitman LLP
10-05209	Lapin Children LLC	Dentons US LLP
10-05236	Toby T. Hobish, et al.	Dentons US LLP
10-05257	Edward A. Zraick, Jr., et al.	Hunton & Williams LLP
10-05312	Doron Tavlin Trust U/A 2/4/91, et al.	Chaitman LLP
10-05377	Richard G. Eaton	Chaitman LLP
10-05420	Gunther K. Unflat	Chaitman LLP
10-05435	Keith Schaffer, et al.	Chaitman LLP

## **EXHIBIT B**

BARCODE NO.	Year	BLMIS BOX LABEL INFO	DOCUMENT/REPORT TYPE
A04275	1978	Stock Record Summary 12/29/78 to 12/31/80 Roll # 75 DUP	POSITIONS / STOCK RECORD / TRADING
A04274	1981	Stock Record Jan 81 to Sept 81 Stock Record Special 3/81 to 9/81 Roll 20 ORG	POSITIONS / STOCK RECORD / TRADING
A04276	1981	Special Stock Record Summary 10/30/81 to 12/31/82 Roll 63 ORG	POSITIONS / STOCK RECORD / TRADING
A04277	1981	Stock Record Summary 10/30/81 to 12/31/82 Roll # 76 DUP	POSITIONS / STOCK RECORD / TRADING
A04286	1982	Roll 278 DUP Portfolio Management Report as of 12/31/82 to 12/31/85	PMR
A04123	1983	Stock Record Summary #17 1/31/83 to 12/30/83 Roll #224 ORIGINAL FILM	POSITIONS / STOCK RECORD / TRADING
A04124	1983	Stock Record Summary #17 1/31/83 to 12/30/83 Roll #224 DUP	POSITIONS / STOCK RECORD / TRADING
A04302	1983	NBNA Bank Ledgers 1/31/83 to 12/31/85 No 3,00000'S Numbers Roll 230 DUP	CUSTOMER LEDGER
A04304	1983	NBNA Bank Ledgers 1/83 to 12/85 3-00000-1-2 3-00000-1-0 Roll # 231 DUP	CUSTOMER LEDGER
A04295	1983	Form 1099 Acct 17 Year Ending 12/31/83 to 12/31/85 Roll 271 DUP	TAX
A04296	1983	Form 1099 Acct 17 Year Ending 12/31/83 to 12/31/85 Roll 271 ORG	TAX
A04125	1983	Special Stock Record Summary #17 1/31/83 to 12/30/83 Roll #204A ORIGINAL FILM	POSITIONS / STOCK RECORD / TRADING
A04126	1983	Special Stock Record Summary #17 1/31/83 to 12/30/83 Roll #204A DUP	POSITIONS / STOCK RECORD / TRADING
A04132	1984	Stock Record Summary #17 1/12/84 to 12/31/84 Roll 225 DUP	POSITIONS / STOCK RECORD / TRADING
A04133	1984	Stock Record Summary #17 1/12/84 to 12/31/84 Roll 225 ORG	POSITIONS / STOCK RECORD / TRADING
A04130	1984	Special Stock Record Summary #17 1/31/84 to 12/31/84 Roll 204-B DUP	POSITIONS / STOCK RECORD / TRADING
A04131	1984	Special Stock Record Summary #17 1/31/84 to 12/31/84 Roll 204-B ORG	POSITIONS / STOCK RECORD / TRADING
A04268	1985	Cash + Securities For Settlement #017 2/1/85 to 3/7/85 Roll 166 DUP	C+S
A04267	1985	Cash + Securities For Settlement #017 1/2/85 to 1/30/85 Roll 165 DUP	C+S
A04269	1985	Cash + Securities For Settlement #017 3/8/85 to 5/14/85 Roll 167 Dup	C+S
A04270	1985	Cash + Securities For Settlement #017 11/19/85 to 12/31/85 DUP Roll 171	C+S
A04294	1985	Settled Trades #05 4/30/85 to 5/31/85 Original Film Roll #195	POSITIONS / STOCK RECORD / TRADING
A04127	1985	Special Stock Record Summary #17 1/31/85 to 12/31/85 Roll #205 ORG	POSITIONS / STOCK RECORD / TRADING
A04129	1985	Special Stock Record Summary 17 1/31/85 to 12/31/85 Roll #205 DUP	POSITIONS / STOCK RECORD / TRADING
A04128	1985	Stock Record Summary 17 1/2/85 to 12/31/85 Roll #226 ORG	POSITIONS / STOCK RECORD / TRADING
A03054	1985	Bernard L. Madoff P & L 1985 & 1986	P+L

BARCODE NO.	Year	BLMIS BOX LABEL INFO	DOCUMENT/REPORT TYPE
A04139	1986	Stock Record Summary #17 1/13/86 to 11/28/86 Roll 272 ORG	POSITIONS / STOCK RECORD / TRADING
A04157	1986	Stock Record Summary #17 1/13/86 to 11/28/86 Roll 272 DUP	POSITIONS / STOCK RECORD / TRADING
A04140	1986	Stock Record Summary #17 11/30/86 to 12/31/86 Roll 273 DUP	POSITIONS / STOCK RECORD / TRADING
A04149	1986	Special Stock Record Summary #17 1/31/86 to 12/31/86 Roll 274 ORG	POSITIONS / STOCK RECORD / TRADING
A04156	1986	Special Stock Record Summary #17 1/31/86 to 12/31/86 Roll 274 DUP	POSITIONS / STOCK RECORD / TRADING
A04305	1986	Trade Edit & Trade Date Blotters #05 5/8/86 to 5/29/86 Roll 286 ORG	POSITIONS / STOCK RECORD / TRADING
A04307	1986	Trade Edit and Trade Date Blotters #05 5/30/86 to 6/20/86 Roll 287 ORG	POSITIONS / STOCK RECORD / TRADING
A04309	1986	Trade Edit and Trade Date Blotters #05 6/23/86 to 7/15/86 Roll 288 ORG	POSITIONS / STOCK RECORD / TRADING
A04308	1986	Trade Edit and Trade Date Blotters #05 8/7/86 to 8/28/86 Roll 290 ORG	POSITIONS / STOCK RECORD / TRADING
A04159	1986	Trade Edit and Trade Date Blotters #05 8/29/86 to 9/19/86 Roll 291 ORG	POSITIONS / STOCK RECORD / TRADING
A04160	1986	Trade Edit and Trade Date Blotters #05 9/22/86 to 10/10/86 Roll 292 ORG	POSITIONS / STOCK RECORD / TRADING
A04161	1986	Trade Edit and Trade Date Blotters #05 10/13/86 to 10/29/86 Roll 293 ORG	POSITIONS / STOCK RECORD / TRADING
A04162	1986	Trade Edit and Trade Date Blotters #05 10/30/86 to 11/13/86 Roll 294 ORG	POSITIONS / STOCK RECORD / TRADING
A04163	1986	Trade Edit and Trade Date Blotters #05 11/14/86 to 11/28/86 Roll 295 ORG	POSITIONS / STOCK RECORD / TRADING
A04234	1986	Roll 298 Org Customers 1986 Cash & Securities 1987 Stock Borrow 1987	C+S
A04178	1986	Roll #861 1099 12/31/87 Tax Year End 1986 & Portfolio Special 1986-1987	OTHER
A04223	1987	Roll 285 Dup Brokers 87 Jan Oct 1987	POSITIONS / STOCK RECORD / TRADING
A04222	1987	Roll 286 Org Cash & Securities 1987 (Part 1)	C+S
A04221	1987	Roll 287 Org Cash & Securities 1987 (Part 2)	C+S
A04220	1987	Roll 290 Org Settle Date Blotters 11/2/87 - 11/13/87	POSITIONS / STOCK RECORD / TRADING
A04219	1987	Roll 299 Orig Reserve 5/8/87 - 11/6/87 Customrs 2/87 to 10/87	POSITIONS / STOCK RECORD / TRADING
A04353	1987	Roll 299 Org Trade Edit + Trade Date Blotters #05 1/2/87 to 1/12/87	POSITIONS / STOCK RECORD / TRADING
A04354	1987	Roll 300 Org Trade Edit + Trade Date Blotters #05 1/13/87 to 1/21/87	POSITIONS / STOCK RECORD / TRADING
A04218	1987	Roll 301 Org Edit lists Jan-Oct 87	POSITIONS / STOCK RECORD / TRADING
A04355	1987	Roll 301 Org Trade Edit + Trade Date Blotters 05 1/22/87 to 1/29/87	POSITIONS / STOCK RECORD / TRADING
A04217	1987	Roll 302 Org Daily Stock Record June 1987	POSITIONS / STOCK RECORD / TRADING

BARCODE NO.	Year	BLMIS BOX LABEL INFO	DOCUMENT/REPORT TYPE
A04356	1987	Roll 315 Org Trade Edit + Trade Date Blotters #05 2/11/87 - 2/23/87	POSITIONS / STOCK RECORD / TRADING
A04360	1987	Roll 319 Org Trade Edit & Trade Date Blotters #05 4/7/87 to 4/16/87	POSITIONS / STOCK RECORD / TRADING
A04361	1987	Roll 320 Org Trade Edit + Trade Date Blotters #05 4/20/87 to 5/8/87	POSITIONS / STOCK RECORD / TRADING
A04362	1987	Roll #321 Org Trade Edit + Trade Date Blotters 5/11/87 to 5/22/87	POSITIONS / STOCK RECORD / TRADING
A04122	1987	Madoff Stock Records Summary Reg House 17 Roll 475 Dup 7/9/87 to 12/31/87	POSITIONS / STOCK RECORD / TRADING
A04121	1987	Madoff Stock Records Summary Reg Jan to Mar Roll 477 Dup Spec 1/31/87 to 12/31/87	POSITIONS / STOCK RECORD / TRADING
A04120	1987	Madoff Stock Records Summary Roll 478 Dup 4/16/87 to 6/30/87 Reg House 17	POSITIONS / STOCK RECORD / TRADING
A03055	1987	Bernard L. Madoff P & L 1987 & 1988	P+L
A04340	1988	Roll #294 Org Settle Date Blotters 1/12/88 - 1/20/88	POSITIONS / STOCK RECORD / TRADING
A04343	1988	Roll #297 Org Settle Date Blotters 4/13/88 - 4/25/88	POSITIONS / STOCK RECORD / TRADING
A04344	1988	Roll #300 org Report Blotters Settlement 2/10/88 - 2/29/88	POSITIONS / STOCK RECORD / TRADING
A04233	1988	Roll #353 Org Daily Audit 1/4/88 - 1/8/88	POSITIONS / STOCK RECORD / TRADING
A04205	1988	Roll #354 Org Daily Audit 1/12/88 - 1/19/88	POSITIONS / STOCK RECORD / TRADING
A04207	1988	Roll #355 Org Daily Audit 1/22/88 - 1/27/88	POSITIONS / STOCK RECORD / TRADING
A04206	1988	Roll 356 Org Daily Audit 1/28/88 - 2/18/88	POSITIONS / STOCK RECORD / TRADING
A04250	1988	Roll 357 Org Daily Audit 2/19/88 - 2/26/88	POSITIONS / STOCK RECORD / TRADING
A04257	1988	Roll 363 Org Daily Audit 4/6/88 - 4/14/88	POSITIONS / STOCK RECORD / TRADING
A04256	1988	Roll # 364 Org Daily Audit 4/15/88 - 4/20/88	POSITIONS / STOCK RECORD / TRADING
A04255	1988	Roll 365 Org Daily Audit 4/21/88 - 4/27/88	POSITIONS / STOCK RECORD / TRADING
A04254	1988	Roll 366 Org Daily Audit 2/2/88 - 2/8/88	POSITIONS / STOCK RECORD / TRADING
A04253	1988	Roll 367 Org Daily Audit 2/9/88 - 2/12/88	POSITIONS / STOCK RECORD / TRADING
A04249	1988	Roll 370 Org DA 4/28/88 - 5/2/88	POSITIONS / STOCK RECORD / TRADING
A04204	1988	Roll 371 Org Bernard L. Madoff Daily Audit 5/3/88 - 5/5/88	POSITIONS / STOCK RECORD / TRADING
A04252	1988	Roll 372 Org Daily Audit 5/6/88 - 5/10/88	POSITIONS / STOCK RECORD / TRADING
A04251	1988	Roll 373 Org Daily Audit 5/11/88 - 5/13/88	POSITIONS / STOCK RECORD / TRADING
A04179	1988	Roll 374 Org Daily Audit 5/16/88 - 5/18/88	POSITIONS / STOCK RECORD / TRADING



BARCODE NO.	Year	BLMIS BOX LABEL INFO	DOCUMENT/REPORT TYPE
A04180	1988	Roll 375 Org Daily Audit 5/19/88 - 5/23/88	POSITIONS / STOCK RECORD / TRADING
A04181	1988	Roll 376 Org Daily Audit 5/24/88 - 5/26/88	POSITIONS / STOCK RECORD / TRADING
A04182	1988	Roll #377 Org Daily Audit 5/27/88 - 6/1/88	POSITIONS / STOCK RECORD / TRADING
A04323	1988	Roll 378 Org Daily Audit 6/2/88 - 6/3/88 Bernard L. Madoff	POSITIONS / STOCK RECORD / TRADING
A04266	1988	Roll 379 Org Daily Audit 6/6/88 - 6/7/88 Bernard L. Madoff	POSITIONS / STOCK RECORD / TRADING
A04265	1988	Roll 380 Org Daily Audit 6/8/88 - 6/13/88 Bernard L. Madoff	POSITIONS / STOCK RECORD / TRADING
A04264	1988	Roll 381 Org Daily Audit 6/14/88 - 6/17/88	POSITIONS / STOCK RECORD / TRADING
A04263	1988	Roll 382 Org Daily Audit 6/20/88 - 6/23/88	POSITIONS / STOCK RECORD / TRADING
A04261	1988	Roll 383 Org Daily Audit 6/24/88 - 6/29/88	POSITIONS / STOCK RECORD / TRADING
A04260	1988	Roll 384 Org Daily Audit 6/30/88 - 7/8/88	POSITIONS / STOCK RECORD / TRADING
A04259	1988	Roll 385 Daily Audit 7/11/88 - 7/14/88	POSITIONS / STOCK RECORD / TRADING
A04258	1988	Roll 386 Org Daily Audit 7/5/88 - 7/6/88	POSITIONS / STOCK RECORD / TRADING
A04262	1988	Roll 387 Org Daily Audit 7/15/88 - 7/19/88	POSITIONS / STOCK RECORD / TRADING
A04324	1988	Roll 388 Org Daily Audit DA 7/20/88 - 7/25/88 Bernard L. Madoff	POSITIONS / STOCK RECORD / TRADING
A04325	1988	Roll 389 DA Org 7/26/88 - 7/29/88 Bernard L. Madoff	POSITIONS / STOCK RECORD / TRADING
A04326	1988	Roll 390 Org DA 8/1/88-8/4/88 Bernard L. Madoff	POSITIONS / STOCK RECORD / TRADING
A04327	1988	Roll 391 Org DA 8/5/88 - 8/8/88 Bernard L. Madoff	POSITIONS / STOCK RECORD / TRADING
A04352	1988	Roll #392 DA 8/9/88 - 8/11/88	POSITIONS / STOCK RECORD / TRADING
A04351	1988	Roll #393 Org DA 8/12/88 - 8/17/88	POSITIONS / STOCK RECORD / TRADING
A04350	1988	Roll #394 Org DA 8/18/88 - 8/23/88	POSITIONS / STOCK RECORD / TRADING
A04349	1988	Roll #395 Org. 8/24/88 - 8/31/88	POSITIONS / STOCK RECORD / TRADING
A04348	1988	Roll #396 Org DA 9/1/88 - 9/8/88	POSITIONS / STOCK RECORD / TRADING
A04347	1988	Roll #397 Org 9/8/88 - 9/9/88	POSITIONS / STOCK RECORD / TRADING
A04346	1988	Roll #399 Org 9/14/88 - 9/15/88 Daily Audit	POSITIONS / STOCK RECORD / TRADING
A04345	1988	Roll #400 Org 9/16/88 - 9/19/88	POSITIONS / STOCK RECORD / TRADING

BARCODE NO.	Year	BLMIS BOX LABEL INFO	DOCUMENT/REPORT TYPE
A04248	1988	Roll #402 Orig Daily Activity 8/26/88 - 9/26/88	POSITIONS / STOCK RECORD / TRADING
A04247	1988	Roll #403 Orig Daily Activity 9/27/88 - 9/30/88	POSITIONS / STOCK RECORD / TRADING
A04246	1988	Roll #404 Org Daily Activity 10/3/88 - 10/6/88	POSITIONS / STOCK RECORD / TRADING
A04245	1988	Roll 405 Org Daily Activity 10/7/88 - 10/12/88	POSITIONS / STOCK RECORD / TRADING
A04244	1988	Roll 406 Org Daily Activity 10/13/88 - 10/17/88	POSITIONS / STOCK RECORD / TRADING
A04328	1988	Roll #407 Org Daily Activity 10/18/88 - 10/21/88	POSITIONS / STOCK RECORD / TRADING
A04330	1988	Roll #408 Org Daily Activity 10/24/88 - 10/27/88	POSITIONS / STOCK RECORD / TRADING
A04332	1988	Roll #409 Org Daily Activity 10/28/88 - 11/2/88	POSITIONS / STOCK RECORD / TRADING
A04331	1988	Roll #410 Org Daily Activity 11/3/88 - 11/8/88	POSITIONS / STOCK RECORD / TRADING
A04329	1988	Roll #411 Org Daily Activity 11/9/88 - 11/14/88	POSITIONS / STOCK RECORD / TRADING
A04334	1988	Roll #413 Org Daily Activity 11/21/88 - 11/25/1988	POSITIONS / STOCK RECORD / TRADING
A04335	1988	Roll #414 Org Daily Activity 11/28/88 - 12/1/1988	POSITIONS / STOCK RECORD / TRADING
A04231	1988	Roll #420 Org Daily Activity 1/3/88 - 1/5/88	POSITIONS / STOCK RECORD / TRADING
A04227	1988	Roll #421 Org Daily Activity 1/6/88 - 1/10/88	POSITIONS / STOCK RECORD / TRADING
A04194	1988	Madoff #843 Customer Ledgers Jan 88 to Feb 88	CUSTOMER LEDGER
A04195	1988	Madoff # 844 Customer Ledgers march 88 to April 88	CUSTOMER LEDGER
A04196	1988	Madoff #845 Customer Ledgers May 88 to June 88	CUSTOMER LEDGER
A04197	1988	Madoff # 846 Customer Ledgers July 88 to August 88	CUSTOMER LEDGER
A04198	1988	Madoff #847 Customer Ledgers Sept 88 to Oct 88	CUSTOMER LEDGER
A04199	1988	Madoff #848 Customer Ledgers Nov 88 to Dec 88	CUSTOMER LEDGER
A01183	1988	Madoff Roll 858 Stock Record Summary April 1988 - March 1988	POSITIONS / STOCK RECORD / TRADING
A04184	1988	Roll #858 Stock Record Summary April 1988 to March 1988 (Regular)	POSITIONS / STOCK RECORD / TRADING
A01185	1988	Madoff Roll 859 Stock Record Summary Sept 1988 to Dec 1988	POSITIONS / STOCK RECORD / TRADING
A04183	1988	Roll #859 Stock Record Summary Sept 1988 to Dec 1988 Regular	POSITIONS / STOCK RECORD / TRADING
A01193	1988	Madoff Special Stock Record Summary Roll 860 Jun-Jul 1988 - Aug-Dec 1989	POSITIONS / STOCK RECORD / TRADING
A04200	1988	Roll #860 Stock Record Summary Jan-July 1988 Aug 1989 - Dec 1989 Special	POSITIONS / STOCK RECORD / TRADING
A01184	1988	Madoff Roll 862 Year End 1988, Stock Record Summary Oct Nov, Dec 1988 Stock Record Summary July 1988 to Aug 1988	POSITIONS / STOCK RECORD / TRADING

BARCODE NO.	Year	BLMIS BOX LABEL INFO	DOCUMENT/REPORT TYPE
A04235	1988	Roll # 862 Madoff Year End 1988, Stock Record Summary (Spec) Oct, Nov, Dec, 1988, Stock Record Summary July-Aug 1988	POSITIONS / STOCK RECORD / TRADING
A01728	1988	Bernard L. Madoff Roll #3400 Open Long Position by Stock 01/1988	POSITIONS / STOCK RECORD / TRADING
A01706	1988	Bernard L. Madoff #3468 Open Long Position by Stock 05/1988 2 of 2 Duplicate	POSITIONS / STOCK RECORD / TRADING
A01746	1988	Bernard L. Madoff #3615 Abbr. Open Long Position By Cust. 1/98 to 12/98 DUPLICATE	POSITIONS / STOCK RECORD / TRADING
A03057	1988	Bernard L. Madoff Customer Order Type Analys 89-90 Broker Volume Comm Report 88-91	POSITIONS / STOCK RECORD / TRADING
A04237	1989	Roll #422 Org Daily Activity 1/11/89 - 1/16/89	POSITIONS / STOCK RECORD / TRADING
A01192	1989	Daily Activity 1/17/89 - 1/20/89 Roll #423 Org	POSITIONS / STOCK RECORD / TRADING
A01195	1989	Madoff Stock Record Summary Aug 89 to Jan 89 Roll #856 (Special)	POSITIONS / STOCK RECORD / TRADING
A04202	1989	Roll #856 Stock Record Summary Aug 89 to Jan 89 (Special)	POSITIONS / STOCK RECORD / TRADING
A01196	1989	Madoff Stock Record Summary Jan 89 - Aug 89 Roll 857 Reg Aug-Dec 89 Special Jan-Jul 89	POSITIONS / STOCK RECORD / TRADING
A04201	1989	Roll #857 Stock Record Summary Jun 89 - Aug 89 Special Jan -> July 89	POSITIONS / STOCK RECORD / TRADING
A01194	1989	Bernard L. Madoff Regular Stock Record Jan-July 1989 #865	POSITIONS / STOCK RECORD / TRADING
A04203	1989	#865 Regular Stock Record Summary January to July 1989	POSITIONS / STOCK RECORD / TRADING
A03063	1989	Bernard L. Madoff P & L 1989	P+L
A01217	1990	May-Jun Sept-June Oct-Nov Madoff Roll #1479 Dec is on Roll 1480 Open Long Position Report by Stock January to November 1990 Original	POSITIONS / STOCK RECORD / TRADING
A04225	1990	Roll # 1479 Dup Open Long Position Report by Stock January to November 1990 Dec is on roll 1480	POSITIONS / STOCK RECORD / TRADING
A01214	1990	Bernard L. Madoff Roll #1480 Open Long Position Report by Customer January to December 1990 Duplicate. Feb missing. NOTE: Open Report Long Position By Stock for 12/90 is likely on this media as well.	POSITIONS / STOCK RECORD / TRADING
A04186	1990	Madoff #1480 Feb Missing Open Long Position Report by Customer January + December 1990	POSITIONS / STOCK RECORD / TRADING
A01215	1990	Madoff #1481 Special Stock Record January to December 1990 Original	POSITIONS / STOCK RECORD / TRADING
A04185	1990	Madoff #1481 Special Stock Record January-December 1990 Duplicate	POSITIONS / STOCK RECORD / TRADING
A04226	1990	Madoff # 1482 original Regular Stock Record January to December 1990	POSITIONS / STOCK RECORD / TRADING
A01212	1990	Bernard L. Madoff Roll # 1483 End of Year Portfolio 1990 Group Buying 1990	OTHER

BARCODE NO.	Year	BLMIS BOX LABEL INFO	DOCUMENT/REPORT TYPE
A04224	1990	madoff # 1483 Original End of Year Portfolio 1990 Group Buying 1990	POSITIONS / STOCK RECORD / TRADING
A04364	1991	# 1716 Cust Ledger Jan A-Z 1991	CUSTOMER LEDGER
A04365	1991	# 1717 Cust ledger Feb A-Z 1991	CUSTOMER LEDGER
A04367	1991	# 1719 Orig Cust ledger April A-Z 1991	CUSTOMER LEDGER
A04368	1991	# 1720 Dup Cust ledger May A-Z 1991	CUSTOMER LEDGER
A04369	1991	# 1721 Orig Cust Ledger June A-Z 1991	CUSTOMER LEDGER
A04370	1991	# 1722 Orig Cust. Ledger July A-Z 1991	CUSTOMER LEDGER
A04371	1991	# 1723 Orig Cust ledger Aug Z-A 1991	CUSTOMER LEDGER
A04372	1991	# 1724 Orig Cust Ledger Sept A-Z 1991	CUSTOMER LEDGER
A04373	1991	# 1725 Orig Cust Ledger Oct A-Z 1991	CUSTOMER LEDGER
A04374	1991	# 1726 Orig Cust Ledger Nov A-Z 1991	CUSTOMER LEDGER
A04316	1991	# 1727 Orig Customer Ledger Dec A-Z 1991	CUSTOMER LEDGER
A01204	1991	Madoff Abbreviated Portfolio 5-12/91 Portfolio Transactions 1-12/91 Portfolio Management Report 1-7/91 Group Buying Power 1-12/92 #1728 DUP	PMR / PMT
A01210	1991	Madoff Portfolio Management Jan-Dec 1991 #1729 Dup	PMR
A01205	1991	Madoff #1730 Open Long Position By Cust Jan - Dec 1991 Orig	POSITIONS / STOCK RECORD / TRADING
A04388	1991	# 1730 Dup open Long Position by Cust Jan-Dec 1991	POSITIONS / STOCK RECORD / TRADING
A01208	1991	Madoff Open Long Position By Stock Jan-Dec 1991 #1731 Dup	POSITIONS / STOCK RECORD / TRADING
A04386	1991	# 1731 Open Long Position by Stock Jan-Dec 1991	POSITIONS / STOCK RECORD / TRADING
A01209	1991	Madoff Spec. Stock Record Jan-Dec 1991 #1732 Orig	POSITIONS / STOCK RECORD / TRADING
A04387	1991	# 1732 Dup Spec Stock Request Jan-Dec 1991	POSITIONS / STOCK RECORD / TRADING
A01206	1991	Madoff Reg. Stock Record. Jan-Dec 1991 #1733 Orig	POSITIONS / STOCK RECORD / TRADING
A04389	1991	# 1733 Dup Reg Stock Record Jan-Dec 1991	POSITIONS / STOCK RECORD / TRADING
A03060	1991	Bernard L. Madoff Jan to July 1991 P & L	P+L
A04319	1992	# 1837 Customer Ledger JAN 92	CUSTOMER LEDGER
A04377	1992	# 1838 Customer Ledger Feb 1992	CUSTOMER LEDGER
A04378	1992	# 1839 Customer Ledger March 1992	CUSTOMER LEDGER
A04379	1992	# 1840 Customer Ledger April 1992	CUSTOMER LEDGER
A04380	1992	# 1841 Customer Ledger May 1992	CUSTOMER LEDGER
A04381	1992	# 1842 Customer Ledger June 1992	CUSTOMER LEDGER
A04384	1992	# 1843 Customer Ledger July 1992	CUSTOMER LEDGER
A04363	1992	# 1844 Customer Ledger August 1992	CUSTOMER LEDGER
A04322	1992	# 1845 Customer Ledger September 1992	CUSTOMER LEDGER
A04321	1992	# 1846 Customer Ledger October 1992	CUSTOMER LEDGER
A04382	1992	# 1847 Customer Ledger November 1992	CUSTOMER LEDGER
A04383	1992	# 1848 Customer Ledger December 1992	CUSTOMER LEDGER
A01174	1992	Bernard L. Madoff Reg Stock Record Jan to Nov 1992 #1849	POSITIONS / STOCK RECORD / TRADING

BARCODE NO.	Year	BLMIS BOX LABEL INFO	DOCUMENT/REPORT TYPE
A04313	1992	# 1849 Reg Stock Record Jan to Nov 92	POSITIONS / STOCK RECORD / TRADING
A04315	1992	# 1850 Reg Stock Record Nov to Dec 92 Special Stock Record Jan to Oct 92	POSITIONS / STOCK RECORD / TRADING
A01176	1992	Bernard L. Madoff #1851 Open Long Position By Stock Jan to Dec 1992	POSITIONS / STOCK RECORD / TRADING
A04314	1992	# 1851 Open Long Position By Stock Jan to Dec 1992	POSITIONS / STOCK RECORD / TRADING
A01178	1992	Bernard L. Madoff #1852 Open Long Position By Cust Jan to Oct 1992	POSITIONS / STOCK RECORD / TRADING
A04376	1992	# 1852 Open Long Position by Cust. Jan to Oct 1992	POSITIONS / STOCK RECORD / TRADING
A01177	1992	Bernard L. Madoff #1853 Open Long Position By Cust 11/92 to 12/92 ABB Port Mgmt. Match to Dec 92	PMR / OTHER
A04375	1992	# 1853 Open Long by Cust 11/92 to 12/92 ABB Port mgmt. March to Dec 92	PMR / OTHER
A04320	1992	# 1854 Portfolio Mgmt. January to May 92	PMR
A04318	1992	# 1855 Portfolio Mgmt June to December 92	PMR
A04385	1992	# 1856 Port Transaction Jan to Dec 92 Arb. Port. Trans 11-12/92 Group Buying	PMT / OTHER
A01175	1992	Bernard L. Madoff Reg Stock Record Nov to Dec 1992 Special Stock Record Jan to Oct 1992	POSITIONS / STOCK RECORD / TRADING
A04232	1998	#864 1988 Year to Date Portfolio	OTHER

## **EXHIBIT C**

No.	Adv. Pro. No.	Defendants	Counsel	Fact Discovery Completion Deadline
1	10-04486	The Norma Shapiro Revocable Declaration of Trust Under Agreement Dated 9/16/08, et al.	Dentons US LLP	March 5, 2015
2	10-04702	S&L Partnership, a New York partnership, et al.	Dentons US LLP	October 9, 2015
3	10-04878	Lisa Beth Nissenbaum Trust, et al.	Chaitman LLP	October 19, 2012
4	10-04882	Laura E. Guggenheimer Cole	Dentons US LLP	March 26, 2015
5	10-05130	Barbara Kotlikoff Harman	Chaitman LLP	April 30, 2015